

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____	
v.	:	DATE FILED: _____	
CARLOS RIVERA	:	VIOLATIONS:	18 U.S.C. § 1956(a)(2)(B)(i) (Money laundering - 18 counts)

I N F O R M A T I O N

COUNTS ONE THROUGH EIGHTEEN

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to this Information:

1. Defendant CARLOS RIVERA owned and operated a Western Union money transfer center and check cashing business at 227 W. Lehigh Avenue in Philadelphia, Pennsylvania.
2. Western Union had more than 22,000 money transfer locations throughout the United States and was required to comply with the anti-money laundering and currency transaction reporting requirements of the Bank Secrecy Act and train its agents on the various requirements of this law.
3. Defendant CARLOS RIVERA received training from Western Union as to the requirements of the Bank Secrecy Act and was fully aware of the possible criminal penalties associated with violating the anti-money laundering and currency transaction reporting requirements of the Bank Secrecy Act.
4. During the period from at least 1998 through 2000, defendant CARLOS RIVERA violated the Bank Secrecy Act by, among other things, (a) engaging in money transfer

transactions through his Western Union agency in which he knew or believed that the funds being transmitted consisted of the proceeds of illicit drug trafficking; (b) deliberately structuring money transfer transactions so as to evade and defeat the currency transaction reporting requirements; (c) failing to verify the true identity of the persons who utilized his services as a money transmitter and instead allowing his customers to use false names and addresses to prevent discovery of their true identities and to avoid triggering the filing of a currency transaction report.

5. From in or about March, 1998 through in or about July, 2000, the U.S. Customs Service initiated an undercover operation in which a government agent posed as a member of a Colombian drug cartel and explained to defendant RIVERA that his job was to collect proceeds of the cocaine trafficking operation in the United States and then transmit the funds to the Dominican Republic. During his conversations with defendant RIVERA, the undercover agent described the nature of the cartel's cocaine trafficking operation and stated that it was involved in moving large quantities of cocaine into the United States.

6. Between April, 1999 and June, 2000, defendant CARLOS RIVERA assisted the undercover agent in laundering what were described to him as cocaine trafficking proceeds by, among other things, transmitting the funds to the Dominican Republic without obtaining proper identification from the undercover agent, structuring the transactions into smaller cash transfers and assigning fictitious names to the alleged senders of the funds in order to evade the currency transaction reporting requirements and disguise the true source of the funds, and by preparing Western Union transaction records that contained false information in order to disguise the nature of the funds transfers and their true source.

7. On or about the dates shown below, at Philadelphia, in the Eastern District of Pennsylvania, defendant

CARLOS RIVERA

did knowingly transport, transmit, and transfer monetary instruments and funds, in the amounts identified below, from a place in the United States, that is, Philadelphia, Pennsylvania, to a place outside the United States, that is the Dominican Republic, knowing that the funds involved in the transportation, transmission and transfer, represented the proceeds of some form of unlawful activity, and knowing that such transportation, transmission and transfer was designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of a specified unlawful activity, that is drug trafficking.

<u>Count</u>	<u>Date of Transaction</u>	<u>Total Amount of Transaction</u>	<u>Destination of Funds</u>
1	April 21, 1999	\$14,000	Dominican Republic
2	April 27, 1999	\$20,000	Dominican Republic
3	June 10, 1999	\$12,000	Dominican Republic
4	October 20, 1999	\$30,000	Dominican Republic
5	December 8, 1999	\$30,000	Dominican Republic
6	January 27, 2000	\$30,000	Dominican Republic
7	March 1, 2000	\$20,000	Dominican Republic
8	March 17, 2000	\$20,000	Dominican Republic

<u>Count</u>	<u>Date of Transaction</u>	<u>Total Amount of Transaction</u>	<u>Destination of Funds</u>
9	March 21, 2000	\$4,000	Dominican Republic
10	April 7, 2000	\$3,000	Dominican Republic
11	April 20, 2000	\$8,000	Dominican Republic
12	April 25, 2000	\$15,000	Dominican Republic
13	May 1, 2000	\$8,000	Dominican Republic
14	May 10, 2000	\$8,000	Dominican Republic
15	May 15, 2000	\$22,000	Dominican Republic
16	May 30, 2000	\$20,000	Dominican Republic
17	June 6, 2000	\$20,000	Dominican Republic
18	June 14, 2000	\$12,000	Dominican Republic
	Total:	<u>\$296,000</u>	

In violation of Title 18, United States Code, Section 1956(a)(2)(B)(i).

PATRICK L. MEEHAN
United States Attorney